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Exhibit 1

**Stipulation Between Plaintiff Center for Biological Diversity and Defendant-Intervenor
Ioneer for Withdrawal of Motion for Preliminary Injunction and Dismissal of 19-cv-01915-
GMN-EJY**

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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

CENTER FOR BIOLOGICAL DIVERSITY,

Plaintiff,

vs.

UNITED STATES BUREAU OF LAND
MANAGEMENT,

Defendant,

and

IONEER USA CORPORATION,

Defendant-Intervenor.

Case No.: 2:19-cv-01915-GMN-EJY

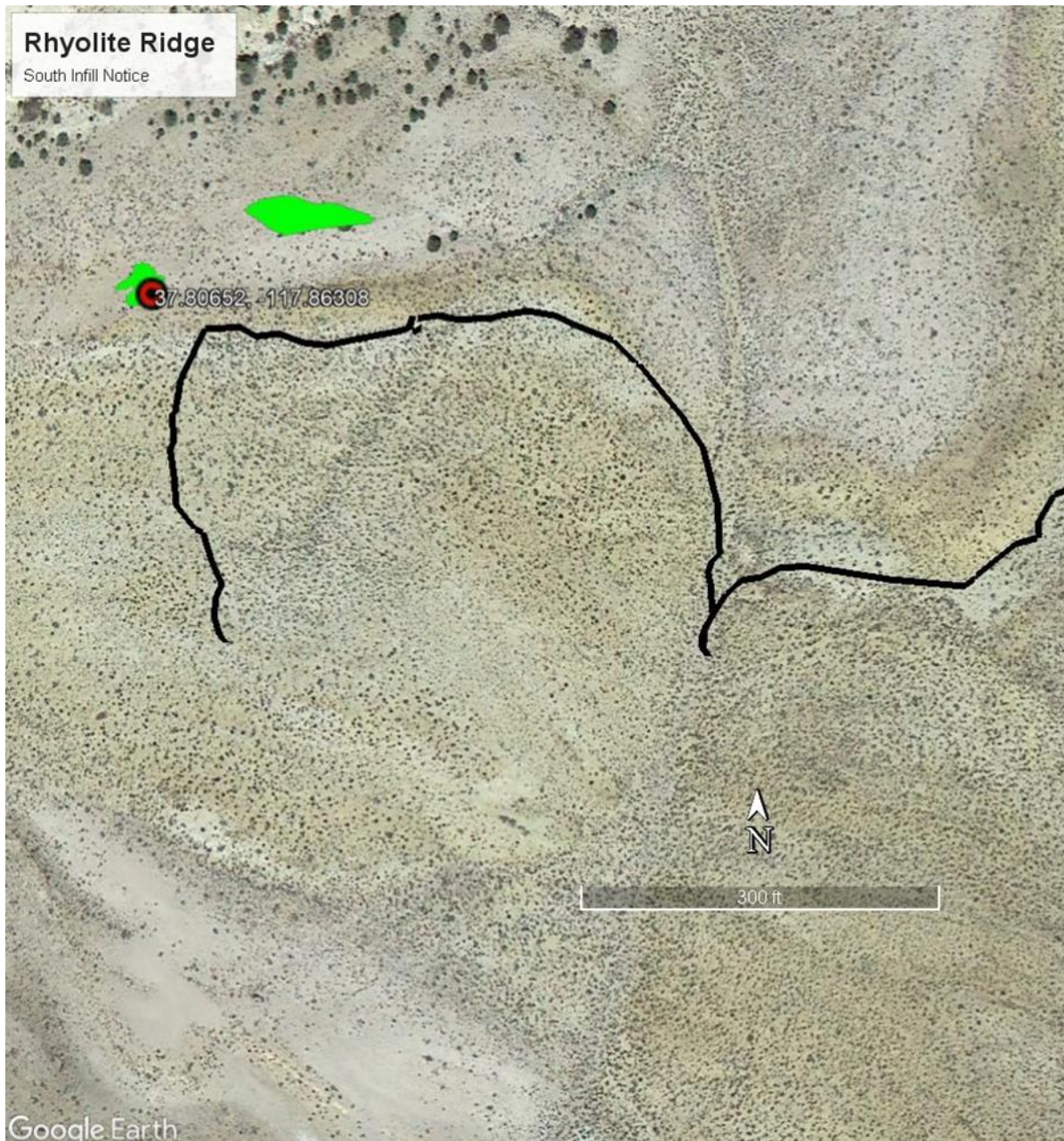
**EXHIBIT 1 - AGREEMENT
BETWEEN PLAINTIFF CENTER FOR
BIOLOGICAL DIVERSITY AND
DEFENDANT-INTERENOR IONEER**

1 This Exhibit memorializes an agreement reached between Plaintiff Center for Biological
2 Diversity (“the Center”) and Intervenor-Defendant, Ioneer USA Corporation (“Ioneer”) in 19-cv-
3 01915-GMN-EJY. This agreement is referenced in the Center’s withdrawal of its motion for
4 preliminary injunction (ECF No. 10) and voluntary dismissal.

5 In exchange for the Center withdrawing its motion for preliminary injunction and
6 voluntarily dismissing this case, 19-cv-01915-GMN-EJY, Ioneer agrees to provide the Center
7 with concurrent notice of any 43 C.F.R. Part 3809 exploration notice or plan of operations that is
8 submitted to the Bureau of Land Management (“BLM”) relating to the Rhyolite Ridge project.
9 This notice will be considered concurrent by Ioneer mailing a copy of any 43 C.F.R. Part 3809
10 exploration notice or plan of operations to the Center on the same day Ioneer submits its
11 exploration notice or plan of operations to BLM.

12 Ioneer also agrees to use only hand-held equipment, as opposed to heavy machinery, for
13 reclamation activities within 30 feet of population 5 of the Tiehm’s buckwheat (as shown in the
14 map on page 4), which is at coordinates 37.80652, -117.86308 (indicated with a bullseye on the
15 map) (Map A).

16 In exchange, the Center also agrees that its client(s) will not drive on the road as
17 identified by a black line in the map below (Map A) that will be reclaimed. The Center also
18 agrees that its client(s) will review the safety plan and agree to familiarize themselves with it and
19 as an accommodation, to be cognizant of its terms if/when visits are made to the areas under
20 reclamation for ground disturbance that occurred from the South Infill and Rhyolite Ridge
21 exploration projects; but the Center’s client(s) are not bound by the terms of Ioneer’s safety plan.
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Map A

For Plaintiff, Center for Biological Diversity:

Signed this 3rd of January 2020

/s/Allison N. Melton

Allison N. Melton

(CO Bar No. 45088)

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Signed this 3rd of January 2020

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